



Public Hearing – February 25, 2022
Before the Environment Committee
Submitted by James Berardino on behalf of the Connecticut Council of Small Towns

RE: SB 115 – An Act Concerning Extended Producer Responsibility for Consumer Packaging

RE: HB 5139 – An Act Concerning Extended Producer Responsibility for Tires

RE: HB 5142 – An Act Concerning Extended Producer Responsibility for Certain Gas Cylinders

Dear Chairs, Co-chairs, Ranking Members, and esteemed members of the Environment Committee, thank you for the opportunity to testify on behalf of the Connecticut Council of Small Towns (COST).

COST **SUPPORTS SB 115, HB 5139, and HB 5142**, with suggested revisions to the language as outlined by coalitions such as CCSMM and CCM, as these bills intend to bolster Connecticut’s environmental stewardship through the establishment of Extended Producer Responsibility (EPR) programs for packaging, tires, and glass cylinders in the state. These bills would bare low costs, if any at all, for the state, provide savings to municipalities, result in the responsible management and disposal of the affected products, and would see the manufacturers and producers associated with such products take responsibility for their environmental impact on the communities that they work in.

These bills come before the state legislature at a time when Connecticut’s trash and waste facilities are in disarray (MIRA) and our waste and recyclables are heavily outsourced. Meanwhile, the Chinese Government has announced the National Sword, a policy aiming to limit the recyclables that the country imports from abroad, stating concerns with foreign entities’ (such as Connecticut) single-stream recycling methods and efficacies.

EPR – Packaging

COST supports **SB 115** with suggested changes to the verbiage below (*proposed by CCM*)

1. Line 428, we propose to strike the word “may” and replace it with “shall.” The DEEP should be required to consider the extent to which the stewardship organization considers the advice and comments of the advisory committee in the creation of the stewardship plan.
2. Lines 457, 462 and 486, we propose the following, “and the advisory committee,” be inserted after the words “the Commissioner of Energy and Environmental Protection.”

EPR - Tires

COST *supports* **HB 5139** as it seeks to establish a state-wide tire stewardship program. This program would require that on or before July 1, 2023, each tire producer, or such producer's designee, shall join the tire stewardship organization and such organization shall submit a plan, for the Commissioner of Energy and Environmental Protection's approval. In addition, tire producers/manufacturers would be responsible for creating and financing the beneficial end use of tires in the state.

Tires are a significant form of blight throughout Connecticut's municipalities, which forces them to brunt the cost of collecting, transporting, and disposing of these tires. This stewardship program seeks to: minimize public sector involvement in the management of discarded tires; provide for free, convenient and accessible state-wide opportunities for the receipt of discarded tires; provide for the free collection of discarded tires from municipal transfer stations that accumulate and segregate fewer than one hundred tires, provided any such municipal transfer station requires collection due to space or permit requirements; provide for producer-financed end-of-life management for discarded tires; and provide for suitable storage and transport arrangements for discarded tires, at no cost to such municipality.

EPR - Gas Cylinders

COST *supports* **HB 5142** as it would require that on or before January 1, 2023, each gas cylinder producer or such producer's designee, including, but not limited to, a gas cylinder stewardship organization, shall notify the Commissioner of Energy and Environmental Protection, in writing, that the producer will act individually or jointly with other producers to submit a stewardship plan to the commissioner for the establishment of a state-wide gas cylinder stewardship program.

A properly designed stewardship program for gas cylinders is the solution for improving and promoting the proper collection of these products. It will ensure these cylinders are repurposed, reused, recertified, requalified, recycled, safely ahead of disposal.

In conclusion, COST supports, along with the changes outlined above, the creation of an Extended Producer Responsibility program for packaging, tires, and glass cylinders, as this system can help to alleviate the current burden municipalities are facing with the ongoing recycling dilemma in Connecticut.

COST respectfully asks the Committee to favorably report SB 115, HB 5139, and HB 5142.